

Comprehensive Compliance Monitoring and Enforcement Report

Report run on: July 8, 2020 7:54:47 PM EDT

Version 6.0

User Selection Criteria

Location: NEW YORK

Handler ID: NYD000705905

Evaluation Date Range: From: 10/01/1990 To: 07/08/2020

Report Results

Number of Handlers: 1

Number of Pages: 9

Report Description

This report provides a complete listing of evaluation, violation and enforcement activities for each handler, including all orphan records. Below the handler id information, the data is presented in three sections; evaluations, violations and enforcements. Notes are provided in each respective section.

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CENTRAL HUDSON ELTINGS CORNERS FACILITY AND STOREROOM

County ULSTER / NY111

NYD000705905

Location: 24 SOUTH STREET; HIGHLAND, NY 12528

REGION 02

Mailing: 284 SOUTH AVENUE; POUGHKEEPSIE, NY 12601

Activity Location:	NY	State District:	NYSDEC R3	Accessibility:		Non-Notifier:		Extract Flag:	Y	Active Site:	Y
Generator:	LQG	Operating TSDF:	---S--	Offsite Receiver:	N	State Unaddressed SNC:	N	EPA Unaddressed SNC:	N		
Short Term Generator:	N	Transporter:	N	IC in Place:	N	State Addressed SNC:	N	EPA Addressed SNC:	N		
Full Enforcement:	---S--	Transfer Facility:	N	EI Indicator (HE/GW):	+ / +	State SNC w/Comp Sched:	N	EPA SNC w/Comp Sched:	N		
CA Wrkld:	N	Converter:	-----	HSM:	NN						
Active State Gen:	Y	State TSDF:	-----	Subpart K:	----						

CEI Evaluation	09/12/2019	Activity Location:	NY	By:	STATE	Identifier:	001	Person:	NYMOC	Suborganization:	R3	Found Violation:	YES
NOC Date:		Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:	09/12/2019	Focus Area:	
Eval. Notes:	TSDF and LQG												

Violation Activity Location: NY Type: PCR Determined Date: 09/12/2019 Determined By Agency: STATE Responsible Agency: STATE
Scheduled Compliance Date: Actual Compliance Date: 10/24/2019 RTC Qualifier: DOCUMENTED Sequence Number: 7

Citation	Seq #	Type	Citation	Notes
	1	PC	PC	

Viol. Notes: Central Hudson's Part 373 Permit Module I.D.4 c) Contingency Plan and Emergency Procedures, Content of Contingency Plan and Attachment VI Contingency Plan.

1. 6 NYCRR Part 373.2.4(c)(1) states that the contingency plan must describe the actions taken in response to fires and explosions. The current Contingency Plan is missing this information. The Contingency Plan that is in the Permit includes this information.
2. 6 NYCRR Part 373.2.4(c)(3) states that the contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services. The current Contingency Plan is missing this information. The Contingency Plan that is in the Permit includes this information.
3. 6 NYCRR Part 373.2.4(c)(5) states that the contingency plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems and decontamination equipment) where the equipment is required. The list must be kept up-to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities. At the time of the inspection, the Contingency Plan did not include the location, and brief outline of the capabilities of each item on the list of emergency and decontamination equipment. The list was not up-to-date.

Enforcement:	Activity Location: NY	Type: 120	Action Date: 11/04/2019	Identifier: 001
	Docket:	Agency: STATE	Responsible Person: NYMOC	Suborganization: R3
CA Component: N	FA Requirement: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:

Note: Penalty information associated with an enforcement action is reported with the enforcement action. For enforcement actions associated with multiple violations, the penalty information will be reported with each violation, however, the penalty is only assessed once, regardless of the number of violations associated with the enforcement.

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NYD000705905

Violation	Activity Location: NY	Type: PCR	Determined Date: 09/12/2019	Determined By Agency: STATE	Responsible Agency: STATE
	Scheduled Compliance Date:		Actual Compliance Date: 10/31/2019	RTC Qualifier: DOCUMENTED	Sequence Number: 8

Citation	Seq #	Type	Citation	Notes
	1	PC	PC	

Viol. Notes: Central Hudson's Part 373 Permit, Attachment II, Inspection Plan, Section II-1(A) Daily Inspections. Each workday, an employee performs a daily inspection and completes the inspection form identified as Sub-Attachment II-1 in the permit for the waste oil storage tanks, including the waste PCB Oil tank. At the time of the inspection, inspections of the waste PCB Oil Tank were not being performed each work day.

Enforcement:	Activity Location: NY	Type: 120	Action Date: 11/04/2019	Identifier: 001
	Docket:	Agency: STATE	Responsible Person: NYMOC	Suborganization: R3
CA Component: N	FA Requirement: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:

Violation	Activity Location: NY	Type: PCR	Determined Date: 09/12/2019	Determined By Agency: STATE	Responsible Agency: STATE
	Scheduled Compliance Date:		Actual Compliance Date: 09/12/2019	RTC Qualifier: OBSERVED	Sequence Number: 9

Citation	Seq #	Type	Citation	Notes
	1	PC	PC	

Viol. Notes: Central Hudson's Part 373 Permit Module 1. E, Land Disposal Restrictions requires the permittee to comply with all applicable provisions in 6 NYCRR Part 376. 6NYCRR Part 376.5(a)(1)(ii)(a) states that each container or tank is clearly marked to identify its contents and the date each period of accumulation begins."

At the time of the inspection, three of four 55-gallon drums of waste paint and debris contaminated with lead were not marked with an accumulation start date. Accumulation start dates (September 10, 2019) were added to the three drums during the inspection.

Enforcement:	Activity Location: NY	Type: 120	Action Date: 11/04/2019	Identifier: 001
	Docket:	Agency: STATE	Responsible Person: NYMOC	Suborganization: R3
CA Component: N	FA Requirement: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:

Violation	Activity Location: NY	Type: PCR	Determined Date: 09/12/2019	Determined By Agency: STATE	Responsible Agency: STATE
	Scheduled Compliance Date:		Actual Compliance Date: 10/24/2019	RTC Qualifier: DOCUMENTED	Sequence Number: 10

Citation	Seq #	Type	Citation	Notes
	1	PC	PC	

Viol. Notes: Central Hudson's Part 373 Permit Module I.D.4 (e) Amendment of Contingency Plan - 6 NYCRR Part 373-2.4(e) states that all amendments of the contingency plan must be approved by the commissioner in accordance with section 373-1.7 of this part. The contingency plan must be amended whenever the list of emergency coordinators changes or the list of emergency equipment changes. Note: a change in the lists of facility emergency coordinators or equipment in the contingency plan constitutes a minor modification of the permit to which the plan is a condition.

At the time of the inspection, the lists of emergency coordinators and emergency equipment in the current contingency plan were different that the lists of emergency coordinators and emergency equipment in the contingency plan in the permit. A minor permit modification was not submitted to the Department for these changes.

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NYD000705905

Enforcement:	Activity Location: NY	Type: 120	Action Date: 11/04/2019	Identifier: 001
	Docket:	Agency: STATE	Responsible Person: NYMOC	Suborganization: R3
CA Component: N	FA Requirement: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:

CEI Evaluation 08/07/2017 Activity Location: NY By: STATE Identifier: 001 Person: NYWME Suborganization: R3 Found Violation: NO
NOC Date: Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: 08/07/2017 Focus Area:
Eval. Notes: The site is a gas and electric utility service center. They have vehicle service and electrical equipment repair. They have PCBs, PCB articles, PCB contaminated PPE, ignitable, occasional aerosol cans, computer and electrical equipment (C7), HID and fluorescent bulbs (UW) and batteries (UW).
We met with Karen Lo, Environmental Coordinator, and Ed Duffy, Environmental Technician.
We discussed the waste stream, paper insulated lead cable (PILC) and how it was in the past impregnated with PCBs. And now they have lead cable with sheathing (LC -no PCBs). The Permit is good until 2020. It has additional corrective actions for remediation of PCBs in the wetlands across the street. We inspected the warehouse and the main storage area. We inspected the PCB permitted storage tank. We then inspected the garage and the PCB transformer shop. The storage room of the warehouse had Universal Waste and capacitors (PCB). Tim Scott, Director of Restoration Logistics and Material Planning, joined us for the rest of the inspection. The main storage area had Universal Waste, transformers, and cartons of PCBs contaminated PPE. The Permitted PCB contaminated oil storage tank and axillary piping was in good shape. It contained 598 gallons. It is usually shipped in December. The garage has a parts washer, a grinder, a bead blaster, a wheel balancer and flammable cabinets. We then went to the transformer shop. This is where most of the PCB contaminated materials are generated. Central Hudson uses the Chlor-Detect tubes to make a PCB in oil determination. The chlor-detect tubes have a mercury compound in them that makes them a Hazardous Waste even if no PCBs are detected. Adjacent to the shop on the upper level is also their battery (UW) and C7/electronic waste storage area storage area.
I observed no violations, the site is in compliance, and the region sent a TKU

No Linked Violations

CEI Evaluation 06/03/2015 Activity Location: NY By: STATE Identifier: 001 Person: NYWME Suborganization: R3 Found Violation: NO
NOC Date: Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: 06/03/2015 Focus Area:
Eval. Notes: The site is a gas and electric utility service center They have vehicle service and electrical equipment repair facilities. They have a 6000 gal double walled PCB contaminated oil storage tank. They are a permitted facility. They have a electrical repair shop that generates the majority of the Hazardous Wastes; PCB contaminated wastes, PCB oils, and spent chlor-detect kits.

They had a regularly scheduled Hazardous Waste pickup, so I observed their procedures and reviewed the paperwork of the Transporter.

The site had no violations and the region sent a TKU.

No Linked Violations

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CEI Evaluation	06/27/2013	Activity Location:	NY	By:	STATE	Identifier:	001	Person:	NYWME	Suborganization:	R3	Found Violation:	NO
NOC Date:		Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:	06/27/2013	Focus Area:	
Eval. Notes: LQG, Permitted TSDF, in compliance													
No Linked Violations													

CEI Evaluation	06/24/2011	Activity Location:	NY	By:	STATE	Identifier:	001	Person:	NYWME	Suborganization:	R3	Found Violation:	NO
NOC Date:		Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:	06/24/2011	Focus Area:	
Eval. Notes: lqg tsdf													
No Linked Violations													

CEI Evaluation	06/05/2009	Activity Location:	NY	By:	STATE	Identifier:	001	Person:	NYWME	Suborganization:	R3	Found Violation:	NO
NOC Date:		Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:	06/05/2009	Focus Area:	
Eval. Notes: lqg tsdf													
No Linked Violations													

CEI Evaluation	09/11/2008	Activity Location:	NY	By:	EPA	Identifier:	001	Person:	R2TM	Suborganization:	RCB	Found Violation:	NO
NOC Date:		Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:	09/11/2008	Focus Area:	
No Linked Violations													

CEI Evaluation	06/29/2007	Activity Location:	NY	By:	STATE	Identifier:	001	Person:	NYWME	Suborganization:	R3	Found Violation:	NO
NOC Date:		Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:	06/29/2007	Focus Area:	
Eval. Notes: TSDF													
No Linked Violations													

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FRR Evaluation	07/14/2006	Activity Location:	NY	By:	EPA	Identifier:	001	Person:	R2JG2	Suborganization:	RCB	Found Violation:	NO
	NOC Date:	Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:	07/14/2006	Focus Area:	
No Linked Violations													

CEI Evaluation	09/23/2005	Activity Location:	NY	By:	STATE	Identifier:	001	Person:	NYSGH	Suborganization:	CO	Found Violation:	NO
	NOC Date:	Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:		Focus Area:	
Eval. Notes: TSDF													
No Linked Violations													

FRR Evaluation	09/15/2004	Activity Location:	NY	By:	STATE	Identifier:	001	Person:	NYAPR	Suborganization:	CO	Found Violation:	NO
	NOC Date:	Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:		Focus Area:	
Eval. Notes: Financial test acceptable.													
No Linked Violations													

CEI Evaluation	07/29/2003	Activity Location:	NY	By:	STATE	Identifier:	001	Person:	NYWBY	Suborganization:	R3	Found Violation:	YES
	NOC Date:	Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:		Focus Area:	
Eval. Notes: minor violation													

Violation	Activity Location: NY	Type: 264.B	Determined Date: 07/29/2003	Determined By Agency: STATE	Responsible Agency: STATE
	Scheduled Compliance Date:		Actual Compliance Date: 09/17/2003	RTC Qualifier: DOCUMENTED	Sequence Number: 5
	Former Citation:PC - Module II, E				

Viol. Notes: Inspections were conducted every two weeks instead of every two weeks.

Enforcement:	Activity Location: NY	Type: 120	Action Date: 08/21/2003	Identifier: 001
	Docket:	Agency: STATE	Responsible Person: NYWBY	Suborganization: R3
	CA Component: N	FA Requirement:	Appeal Initiated:	Appeal Resolved:
Enf. Notes:				
Disposition Status:				

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NYD000705905

CEI Evaluation	09/20/2001	Activity Location:	NY	By:	STATE	Identifier:	001	Person:	NYWBY	Suborganization:	R3	Found Violation:	NO
NOC Date:		Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:		Focus Area:	
Eval. Notes:													
No Linked Violations													

CEI Evaluation	09/26/2000	Activity Location:	NY	By:	STATE	Identifier:	001	Person:	NYWME	Suborganization:	R3	Found Violation:	NO
NOC Date:		Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:		Focus Area:	
Eval. Notes:													
No Linked Violations													

CEI Evaluation	09/30/1999	Activity Location:	NY	By:	STATE	Identifier:	000	Person:	NYWME	Suborganization:	R3	Found Violation:	NO
NOC Date:		Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:		Focus Area:	
Eval. Notes: NO VIOL TY 1/31/00													
No Linked Violations													

CEI Evaluation	12/15/1997	Activity Location:	NY	By:	STATE	Identifier:	000	Person:	NYWME	Suborganization:	R3	Found Violation:	NO
NOC Date:		Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:		Focus Area:	
Eval. Notes: NO VIOL TY LET 2/18/98													
No Linked Violations													

CEI Evaluation	02/14/1997	Activity Location:	NY	By:	STATE	Identifier:	000	Person:	NYTTE	Suborganization:	R3	Found Violation:	NO
NOC Date:		Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:		Focus Area:	
Eval. Notes:	NO VIOL TY LET 2/26/97												
No Linked Violations													

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NYD000705905

CEI Evaluation	02/29/1996	Activity Location:	NY	By:	STATE	Identifier:	000	Person:	NYWBY	Suborganization:	R3	Found Violation:	NO
NOC Date:		Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:		Focus Area:	
Eval. Notes: NO VIOL TY LET 3/20/96													

No Linked Violations

CEI Evaluation	03/15/1995	Activity Location:	NY	By:	STATE	Identifier:	000	Person:	NYWBY	Suborganization:	R3	Found Violation:	NO
NOC Date:		Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:		Focus Area:	
Eval. Notes: THANK YOU LETTER 3/28/95													

No Linked Violations

CEI Evaluation	03/04/1994	Activity Location:	NY	By:	STATE	Identifier:	000	Person:	NYWBY	Suborganization:	R3	Found Violation:	YES
NOC Date:		Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:		Focus Area:	

Violation	Activity Location:	NY	Type: 264.A	Determined Date: 06/07/1994	Determined By Agency: STATE	Responsible Agency: STATE
	Scheduled Compliance Date: 07/07/1994		Actual Compliance Date: 08/22/1994		RTC Qualifier: OBSERVED	Sequence Number: 4
Enforcement:	Activity Location: NY	Type: 120	Action Date: 06/07/1994	Identifier: 000		
	Docket:	Agency: STATE	Responsible Person: NYWBY	Suborganization: R3		
CA Component: N	FA Requirement:	Disposition Status:	Appeal Initiated:	Appeal Resolved:		

CEI Evaluation	01/14/1993	Activity Location:	NY	By:	STATE	Identifier:	000	Person:	NYWBY	Suborganization:	R3	Found Violation:	NO
NOC Date:		Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:		Focus Area:	
Eval. Notes: THANK YOU LETTER 3/23/93													

No Linked Violations

CEI Evaluation	01/30/1992	Activity Location:	NY	By:	STATE	Identifier:	000	Person:	NYWME	Suborganization:	R3	Found Violation:	NO
NOC Date:		Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:		Focus Area:	
Eval. Notes: THANK YOU LETTER 1/11/93													

No Linked Violations

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NYD000705905

CEI Evaluation	01/29/1991	Activity Location:	NY	By:	STATE	Identifier:	009	Person:	NYDEC	Suborganization:	Found Violation:	YES
NOC Date:		Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:	Focus Area:	
Violation	Activity Location:	NY	Type: 264.A	Determined Date:	01/29/1991	Determined By Agency:	STATE	Responsible Agency:	STATE	Sequence Number:	3	
	Scheduled Compliance Date:	04/06/1991	Actual Compliance Date:	04/23/1991	RTC Qualifier:	OBSERVED						
Enforcement:	Activity Location:	NY	Type: 120	Action Date:	03/06/1991	Identifier:	003					
	Docket:		Agency: STATE	Responsible Person:	NYDEC	Suborganization:						
	CA Component:	N	FA Requirement:	Disposition Status:	Appeal Initiated:	Appeal Resolved:						

*** End of Report ***